

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

FREEDOM FROM RELIGION :
FOUNDATION, INC., DOE 1, BY DOE 1'S :
NEXT OF FRIEND AND PARENT, :
MARIE SCHAUB, WHO ALSO SUES ON :
HER OWN BEHALF, DOE 2, BY DOE 2'S :
NEXT OF FRIEND AND PARENT DOE 3, :
WHO ALSO SUES ON DOE'S OWN :
BEHALF, :

Plaintiffs, :
vs. : JURY TRIAL DEMANDED

NEW KENSINGTON-ARNOLD SCHOOL :
DISTRICT, :

Defendant. :

**DEFENDANT'S MOTION TO POSTPONE POST-DISCOVERY STATUS
CONFERENCE AND ORAL ARGUMENT ON DEFENDANT'S MOTION TO COMPEL**

The Defendant, New Kensington-Arnold School District, ("Defendant") by and through its counsel, Anthony G. Sanchez, Esq., and the law firm of Andrews & Price LLC, file the following Motion to Postpone Post-Discovery Status Conference and Oral Argument on Defendant's Motion to Compel averring as follows:

1. A Post-Discovery Status Conference is scheduled in the above-referenced matter for May 20, 2014.
2. The Court was also to hear Oral Argument on Defendant's Motion to Compel on May 20, 2014.
3. Defendant's counsel, Anthony G. Sanchez, is out of town and will not return in time to attend the Status Conference and Oral Argument on May 20, 2014.
4. Counsel, therefore, respectfully asks this Court to reschedule the Defendant's Post-Discovery Status Conference and Oral Argument on Defendant's Motion to Compel.

5. Counsel for the Connellsville Area School District, John Smart, Esq., consents to this Motion, inasmuch as the requested postponement will also postpone its Status Conference in the related matter of Freedom From Religion, et al. vs. Connellsville Area School District.

6. Counsel for the Plaintiff, Marcus Schneider, Esq. was unable to be reached for consent.

WHEREFORE, Defendant New Kensington-Arnold School District respectfully requests that this Court grant the within Motion.

Respectfully submitted,

ANDREWS & PRICE LLC

By: s/ Anthony G. Sanchez
Anthony G. Sanchez, Esquire
PA I.D. #55945
1500 Ardmore Boulevard, Suite 506
Pittsburgh, PA 15221
(412) 243-9700

Counsel for the Defendant
New-Kensington Arnold School District